

March 5, 2020

Duty Magistrate
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: USA v. Thomas Blaha
20-MJ-172

Dear Sir/Madam:

I am the attorney for Defendant Thomas Blaha. On February 20, 2020, Mr. Blaha was arrested and arraigned before Hon. Vera M. Scanlon, who set terms and conditions of pretrial release. Among the conditions of Mr. Blaha's pretrial release, Mr. Blaha is required to post his Garden City, NY home, three (3) rental condominiums in Boca Raton, Florida and his stock in Memory Protection Devices, Inc, as security for the \$1million bond.

The Garden City home and corporate stock were to be pledged by February 27, 2020 and the Florida properties were to be pledged by today, March 5. The home and stock (the combined value of which exceed the \$1million bond) were promptly pledged by confession of judgment on, filed in the Nassau County Supreme Court, on February 25, 2020. Posting the Florida properties, however, has proven more difficult than expected. I have spoken with four different Florida lawyers and a Florida bail bond agent. I have been advised that Florida law has no provision for judgment by confession. None of the professionals I have spoken with has had any idea how to accomplish this task, without the Government filing a civil action against Mr. Blaha, in Palm Beach County.

The purpose of this letter is to ask the Court for an additional two weeks to continue to my efforts to pledge the Florida condominiums. In the alternative, I respectfully ask the Court to

schedule an appearance for further discussion of this matter, without deeming Mr. Blaha in violation of the terms of his pretrial release.

I thank the Court for its consideration.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Kevin B. Faga', with a stylized flourish extending to the right.

Kevin B. Faga, Esq.

cc: AUSA Anna Karamigios, via email and ECF